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12 Attorneys for Defendants
LG CHEM, LTD, and
13 LG CHEM AMERICA, INC.

14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**

16 **OAKLAND DIVISION**

17 IN RE: LITHIUM ION BATTERIES
ANTITRUST LITIGATION

**Master File No. 4:13-md-02420-YGR
MDL NO. 2420**

19 This Document Relates to:

Case No. 4:15-cv-02987-YGR

20 DELL INC. and DELL PRODUCTS L.P.,
Plaintiffs,
21 v.

**STIPULATION AND [PROPOSED]
ORDER EXTENDING THE LG CHEM
DEFENDANTS' TIME TO RESPOND TO
DELL'S COMPLAINT**

22 LG CHEM LTD. *et al.*
23 Defendants.

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1 Individual Action Plaintiffs Dell Inc. and Dell Products L.P. (collectively “Dell”) and
2 Defendants LG Chem Ltd. and LG Chem America, Inc. (collectively “LG Chem”), together
3 “the Parties,” through their respective counsel of record, hereby Stipulate as follows:

4 WHEREAS, the Parties entered into a stipulation on August 5, 2015 (ECF No. 758)
5 (“Stipulation”) to waive service of Dell’s complaint filed on June 26, 2015 (“Complaint”) and to
6 extend LG Chem’s deadline to respond to the Complaint until October 21, 2015; and

7 WHEREAS, the Court entered an Order granting the Stipulation on August 10, 2015 (ECF No.
8 768), thereby setting the deadline for LG Chem to respond as October 21, 2015;

9 WHEREAS, the Parties entered into a stipulation on October 20, 2015 (ECF No. 907) (“Second
10 Stipulation”) to extend LG Chem’s deadline to respond to the Complaint until November 18, 2015; and

11 WHEREAS, the Court entered an Order granting the Second Stipulation on October 26, 2015
12 (ECF No. 917), thereby setting the deadline for LG Chem to respond as November 18, 2015;

13 WHEREAS the Parties have met and conferred and desire to extend the deadline for LG Chem
14 to respond to Dell’s Complaint to January 15, 2016;

15 WHEREFORE, it is stipulated:

16 1. LG Chem shall file an Answer to the Dell Complaint by or before January 15, 2016.
17 2. The Parties agree that this extension will not be used to prejudice Dell’s efforts to seek
18 discovery in the above referenced action.

19 3. The parties agree that LG Chem does not waive and continues to preserve all of its
20 defenses under the Federal Rules of Civil Procedure.

21 **IT IS SO STIPULATED.**

1 Dated: November 11, 2015

2 Respectfully submitted,

3 AKIN GUMP STRAUSS HAUER & FELD LLP

4 By /s/ Reginald Steer

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DELL INC. and DELL PRODUCTS L.P.

ATTESTATION

I, Mollie McGowan Lemberg, hereby attest, pursuant to Northern District of California Local Rule 5-1(i)(3), that concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: November 11, 2015

By: /s/ Mollie McGowan Lemberg
Mollie McGowan Lemberg

IT IS SO ORDERED.

Dated: _____

The Honorable Yvonne Gonzalez Rogers
UNITED STATES DISTRICT JUDGE